

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAY 22 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
QUANTAE DEVON VEALES,)
a/k/a "Q,")
and "King Quality,")
)

4:13CR 00195CEJ

Defendant.

INDICTMENT

COUNT I

The Grand Jury charges that:

Between on or about December 2012 and on or about January 2013, in Jefferson County, Missouri, within the Eastern District of Missouri and elsewhere, the defendant

**QUANTAE DEVON VEALES,
a/k/a "Q," and
"King Quality,"**

did knowingly use facilities in interstate commerce with intent to promote, manage, establish or carry on an unlawful activity, to wit: prostitution, and thereafter did knowingly manage, establish or carry on that illegal activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

COUNT II

The Grand Jury further charges that:

Between on or about December 2012 and on or about January 2013, in Jefferson County, Missouri, within the Eastern District of Missouri and elsewhere, the defendant

**QUANTAE DEVON VEALES,
a/k/a "Q," and
"King Quality,"**

knowingly did persuade, induce, and entice any individual to travel in interstate commerce to engage in prostitution or any sexual activity for which the defendant could be charged with a criminal offense, that is promoting prostitution in the second degree, as proscribed by Section 567.060 of the statutes of the State of Missouri.

In violation of Title 18, United States Code, Section 2422(a).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 924 and 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1951, as set forth in Count I, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense and any firearms and ammunition involved in such offense.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, as set forth in Count II, the defendant shall forfeit to the United States of America any property, real or personal, that was

used or intended to be used to commit or to facilitate the commission of such offense and any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation.

3. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

4. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. one 1994 BMW 325i, VIN: WBABJ5323RJC80925.

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

NOELLE C. COLLINS, #53115MO
Assistant United States Attorney